

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO**

In re:)	Case No. 21-61491
)	
SQUIRRELS RESEARCH LABS, LLC, <i>et</i>)	Chapter 11
<i>al.</i> ,)	
)	Jointly Administered
Debtors.)	
)	Judge Russ Kendig
)	
)	

**EX PARTE MOTION TO EXTEND DEADLINE AND
HEARING DATE AS TO DEBTORS, AVNET, AND INSTANTIATION**

Carl Forsell (“Movant”), by his undersigned counsel, moves this Court to extend the deadline to respond, and the hearing date, on Movant’s *Motion for Relief from the Sale Order for the Limited Purpose of Amending the Distribution Scheme Pending Discovery* (Doc. No. 166, the “Sale Relief Motion”), as to the Debtors, Avnet, Inc., and Instantiation, LLC (the “Response Parties”). Responses to the Sale Relief Motion are current due by March 22, 2022, and a hearing is currently set for March 29, 2022.

Movant avers that *ex parte* relief is appropriate because all potentially interested parties have been properly noticed of the March 22, 2022 response deadline, and therefore will not be prejudiced by an extension of the deadline for the Response Parties. Per this Court’s procedures, Movant could have re-noticed the deadline and hearing date without leave from the Court, but files this *ex parte* motion in an abundance of caution because Movant only seeks to extend the deadline as to the Response Parties.

Movant is submitting a proposed order contemporaneous with the filing of this motion, which will reflect a continued response deadline to the Sale Relief Motion of April 5, 2022, and a

continued hearing date of April 12, 2022 at 2pm. Movant respectfully requests the Court enter the proposed order in substantially the form as uploaded by Movant. Should the Court deny this motion, Movant respectfully requests a grace period extension of the response deadline to the Sale Relief Motion until March 25, 2022, so that the Response Parties are not caught with little time prior to the deadline.

Dated: March 18, 2022

Respectfully submitted,

/s/ Bryan J. Sisto

Bryan J. Sisto (OH 0088143)

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Counsel for Carl Forsell

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that the foregoing was served upon the following on March 18, 2022, via the Court's electronic mail notice list:

- **John C. Cannizzaro** John.Cannizzaro@icemiller.com,
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Dated: March 18, 2022

Respectfully submitted,

/s/ Bryan J. Sisto

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